

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

MOHAMMED THANI A.T. AL THANI,

Plaintiff,

vs.

ALAN J. HANKE, IOLO GLOBAL LLC, SIDNEY
MILLS ROGERS III, LAURA ROMEO, AMY ROY-
HAEGER, SUBGALLAGHER INVESTMENT TURST,
SHERRY SIMS, AND JOHN DOES 1-100,

Defendants.

consolidated with

MARTIN J. STEVENS,

Plaintiff,

vs.

ALAN J. HANKE, IOLO GLOBAL LLC, GUARANTEE
INVESTMENT TRUST, SHERRY SIMS, SIDNEY
MILLS ROGERS III, AMY ROY-HAEGER, AND
JOHN DOES 1-100,

Defendants.

Case No. 1:20-CV-4765 (JPC)

Case No. 1:20-CV-8181 (JPC)

**DECLARATION OF MICHAEL C. HEFTER IN SUPPORT OF PLAINTIFF'S REPLY
IN FURTHER SUPPORT OF PLAINTIFFS' MOTION FOR SUMMARY JUDGMENT**

I, Michael C. Hefter, do hereby declare:

1. I am an attorney duly licensed to practice law before the Courts of New York and am a partner in the law firm of Alston & Bird LLP, 90 Park Avenue, New York NY 10016. I am admitted to practice before this Court and am counsel for Plaintiff in the above-captioned action, and as such am fully familiar with the facts, circumstances, and proceedings herein. I submit this

declaration in support of Plaintiffs' Reply in Further Support of Plaintiffs' Motions for Summary Judgment. I make this declaration on the basis of my own personal knowledge and a review of the relevant documents relating to this action.

2. Attached as **Exhibit 1** is a true and correct copy of the transcript of the February 9, 2023 deposition of Defendant Amy Roy-Haeger in the above-captioned matter, filed here in excerpted form.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: May 17, 2024

/s/ Michael C. Hefter
Michael C. Hefter